

THE HONORABLE: Brian D. Lynch  
CHAPTER 13  
HEARING DATE: March 25, 2020  
HEARING TIME: 1:30 p.m.  
LOCATION: Tacoma, WA  
RESPONSE DUE: March 18, 2020

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re: ) Case No. 16-44392 BDL Ch. 13  
Robert Nicholas Reichl )  
Debtor(s) ) NOTICE OF HEARING AND MOTION  
TO INCUR INDEBTEDNESS

TO: Clerk of the United States Bankruptcy Court; and All parties in interest:

PLEASE TAKE NOTICE that a Motion to Incur Indebtedness (Mortgage Refinance) IS SET FOR  
HEARING as follows:

<b>DATE OF HEARING</b>	<b>March 25, 2020</b>
<b>TIME</b>	<b>1:30 pm</b>
<b>JUDGE</b>	<b>Hon. Brian D. Lynch</b>
<b>LOCATION</b>	<b>Union Station 1717 Pacific Ave. Tacoma, WA 98402 Courtroom I</b>
<b>RESPONSE DUE</b>	<b>March 18, 2020</b>

IF YOU OPPOSE the motion you must file your written response with the court clerk,  
and deliver copies to the undersigned and all interested parties NOT LATER THAN THE RESPONSE  
DATE.

IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion,  
GRANT THE MOTION PRIOR TO THE HEARING WITHOUT FURTHER NOTICE, and  
strike the hearing.

**MOTION**

1 **COMES NOW** the Debtor, by and through their attorney of record, and moves the Court  
2 for an order allowing Debtor to refinance his mortgage.

3 Case Information: Debtor's plan was confirmed 4/14/17

4 Reason For Amendment:

- 5 1. Debtor is requesting approval of a refinance of his residence at 19802 68<sup>th</sup> Ave. E.,  
6 Spanaway, WA 98387  
7 2. Debtor's mortgage is currently being paid outside the plan;  
8 3. The new monthly payment will be \$1,146  
9 4. The terms are provided in the attached Estimated Refinance Statement;  
10 5. Debtor intends to cash out and pay approximately \$19,400.00 and pay off the total  
11 allowed claims;

12 How Creditors Will Be Affected: Creditors are not affected by this Motion

13 WHEREFORE, Debtor moves this Court for an Order Allowing Debtor to Finance Motion  
14 Vehicle.

15 DATED: March 3, 2020

16 Respectfully submitted:

17 /s/ Mark A. Ditton #45432

18 Mark A. Ditton, WSBA#45432

19 Attorney for Debtor(s)

20 1312 Main Street

21 Vancouver, WA 98660

22 360-831-0893

23 mark@nwrelief.com

24 **CERTIFICATE OF SERVICE**

25 The undersigned certifies that a copy of the foregoing Notice of Hearing and Motion to  
Incur Debt and Proposed Order was served upon all Creditors and interested parties per the  
attached mailing matrix and any parties requesting special notice by sending a true, full and exact  
copy enclosed in a sealed envelope by regular postage, prepaid, U.S. Mail, or, where specified,  
electronically:

Served electronically:

Office of the U.S. Trustee;  
Michael Malaier; case trustee

1  
2 Dated this 3rd Day of March, 2019.

3 /s/Mark Ditton  
4 Mark Ditton WSB#45432  
5 360-831-0893 (office)  
6 866-241-4176 (fax)  
7  
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Label Matrix for local noticing  
0981-3  
Case 16-44392-BDL  
Western District of Washington  
Tacoma  
Wed Mar 4 08:15:06 PST 2020  
  
Aegis Funding (Bradley Jones att)  
PO Box 726  
Vashon, WA 98070-0726

2010 Series 4770, LLC  
Bradley Boswell Jones, P.S.  
c/o Bradley B. Jones  
13401 Vashon Hwy SW  
PO Box 726  
Vashon, WA 98070-0726  
  
Barclays Bank Delaware  
Po Box 8801  
Wilmington, DE 19899-8801

2010 Series 4770, LLC  
c/o Douglas Goldrick  
8525 Ferndale Road, Suite 204  
Dallas TX 75238-4400  
  
Bradley, Boswell Jones PS  
13401 Vashon Hwy SW  
PO Box 726  
Vashon, WA 98070-0726

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Salt Lake City, UT 84130-0285

James F Dart  
Shoemaker & Dart, P.S., Inc.  
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Northwest Debt Relief Law Firm  
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IRS  
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Philadelphia, PA 19101-7346

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Vashon, WA 98070-0726

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Tacoma, WA 98402-3002

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612 S. Lucile Street  
Ste 300  
Seattle, WA 98108-2623

Lance E Olsen  
McCarthy & Holthus, LLP  
108 First Avenue South, Suite 300  
Suite 400  
Seattle, WA 98104-2104

Robert Nicholas Reichl  
19802 68th Ave E  
Spanaway, WA 98387-5608

Tacoma Longshoreman Credit Union  
c/o Shoemaker & Dart  
1944 Pacific Avenue  
#307  
Tacoma, wa 98402-3121

Tacoma Longshoremen Credit Union  
3602 Alexander Avenue  
Tacoma, WA 98424-1110

Tacoma Longshoremen Cu  
3602 E Alexander Ave  
Fife, WA 98424-1110

United States Trustee  
700 Stewart St Ste 5103  
Seattle, WA 98101-4438

Verizon  
500 Technology Dr  
Suite 500  
Weldon Spring, MO 63304-2225

Wells Fargo Bank, N.A.  
c/o McCarthy & Holthus, LLP  
108 1st Avenue South  
Ste. 300  
Seattle, WA 98104-2104

Wells Fargo Bank, N.A.  
Default Document Processing  
N9286-01Y  
1000 Blue Gentian Road  
Eagan MN 55121-7700

Wells fargo  
420 montgomery street  
san francisco, CA 94104-1298

harborstone credit union  
PO box 4207  
tacoma, WA 98438-0207

tacoma longshore credit union  
3602 alexander avenue  
tacoma, WA 98424-1110

(u)Courtesy NEF

End of Label Matrix	
Mailable recipients	24
Bypassed recipients	1
Total	25